

RETURN DATE: MARCH 14, 2023 : SUPERIOR COURT  
WILLIAM J. KNIGHT : J.D. OF NEW BRITAIN  
VS. : AT NEW BRITAIN

MATHEW THOMAS, M.D.,  
OCCUPATIONAL MEDICINE OF THE  
NORTHEAST, LLC, BLOOMFIELD  
URGENT CARE LLC, GRANBY URGENT  
CARE LLC, STEPHEN A. KEI, M.D. d/b/a  
THE DOCTORS TREATMENT CENTER  
PLAINVILLE : FEBRUARY 16, 2023

COMPLAINT

COUNT ONE: AS AGAINST OCCUPATIONAL MEDICINE OF THE NORTHEAST, LLC

1. The Plaintiff, **WILLIAM J. KNIGHT**, is an individual residing in the Town of Burlington, Connecticut.

2. On or about November 18, 2020, the Defendant, **OCCUPATIONAL MEDICINE OF THE NORTHEAST, LLC**, was a Connecticut limited liability company that provided medical services at a urgent care facility in Plainville, Connecticut located at 240 East Street, Plainville, Connecticut ("**OCCUPATIONAL MEDICINE**").

3. At all times mentioned herein, the Defendant, **MATHEW THOMAS, M.D.**, was a duly licensed emergency medicine doctor engaged in the practice of medicine in the State of Connecticut.

4. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was an employee, agent, apparent agent, representative, and/or servant of the co-defendant, **OCCUPATIONAL MEDICINE**, and acting within the scope of his employment, agency, apparent agency, representation, authority, and/or apparent authority.

5. At all times mentioned herein, **MATHEW THOMAS, M.D.**, performed his responsibilities as an emergency care physician pursuant to the rules, regulations, practices, protocols and standard operating procedures promulgated by Defendant, **OCCUPATIONAL MEDICINE**.

6. At all times mentioned herein, Defendant **MATHEW THOMAS, M.D.**, was acting in furtherance of the interests of Defendant **OCCUPATIONAL MEDICINE**, and for the benefit of Defendant **OCCUPATIONAL MEDICINE**.

7. On or about November 18, 2020, Plaintiff presented to **OCCUPATIONAL MEDICINE**, 240 East Street, Plainville, Connecticut, where he was evaluated for a finger injury sustained at work with complaints of right index finger swelling, bleeding and discharge following a high-pressure injection injury wherein hydraulic fluid punctured his skin.

8. At said date time and place, Defendant, **MATHEW THOMAS, M.D.**, failed to diagnosis the high-pressure injection injury and make an immediate referral to a hand surgeon for immediate treatment. Plaintiff was discharged from said visit with a differential diagnosis which included finger contusion sprain and instructed to follow up if needed, remain out of work until 11/23/20 and failed to mention the high-pressure injection injury with hydraulic fluid.

9. On or about November 20, 2020, the Plaintiff returned to **OCCUPATIONAL MEDICINE**, with complaints of significant finger pain, swelling, blisters and discoloration wherein a referral to a hand surgeon was made by defendant, **MATHEW THOMAS, M.D.**

10. On or about November 20, 2020, the Plaintiff sought treatment from an orthopedic surgeon, Christopher Judson M.D., who diagnosed plaintiff with a high pressure injection injury with compartment syndrome of the right index finger which called for emergent incision and drainage with compartment release and irrigation of the flexor tendon sheath.

11. On or about December 30, 2020, Plaintiff underwent amputation of his right index finger due to the negligence of the defendants, **MATHEW THOMAS, M.D.**, and **OCCUPATIONAL MEDICINE**.

12. While under the care, treatment, monitoring, diagnosing and supervision of the defendants, **MATHEW THOMAS, M.D.**, and **OCCUPATIONAL MEDICINE**, and/or their servants, agents, apparent agents and/or employees, the plaintiff, **WILLIAM J. KNIGHT**, suffered severe, serious, painful and permanent injuries as hereinafter set forth.

13. The said injuries suffered by the plaintiff, **WILLIAM J. KNIGHT**, were caused by the failure of defendants, **MATHEW THOMAS, M.D.**, and **OCCUPATIONAL MEDICINE OF THE NORTHEAST, LLC**. and/or their servants, agents, apparent agents and/or employees to exercise reasonable care under all of the facts and circumstances then and there present in that they:

- a. failed to adequately and properly care for, treat, diagnose, and monitor plaintiff for a high-pressure injection finger injury
- b. performed inappropriate care, and treatment of the plaintiff while at urgent care facility;
- c. failed to recognize that the care, treatment and chosen approach of diagnosis of finger contusion/sprain was not the appropriate method

to treat a high-pressure injection injury;

- d. failed to recognize that the care, treatment and chosen approach placed plaintiff at an increased risk of an amputation;
- e. improperly put plaintiff at an increased risk of the need for amputation including, loss of the entire index finger of his right hand;
- f. failed to provide or refer the plaintiff immediately to physicians and surgeons who possess the requisite knowledge, skill and experience to adequately and properly care for, treat, diagnose, monitor and supervise patients such as plaintiff;
- g. failed to promulgate and/or enforce rules, regulations, standards and protocols for the care and treatment of patients such as plaintiff.

14. As a result of the carelessness and negligence of defendants, **MATHEW THOMAS, M.D.**, and **OCCUPATIONAL MEDICINE OF THE NORTHEAST, LLC** and/or their servants, agents, apparent agents and/or employees, **WILLIAM J. KNIGHT** suffered the following severe, serious, painful and permanent injuries:

- a. right hand/finger injury;
- b. compartment syndrome of the right index finger;
- c. right finger amputation;
- d. phantom finger syndrome;
- e. significant right index finger pain;
- f. loss of function and strength to right hand; and
- g. great pain and mental anguish.

15. As a result of the aforementioned injuries, **WILLIAM J. KNIGHT** has sustained significant pain and suffering, great mental anguish and has been permanently deprived of his ability to carry on and enjoy life activities.

16. As a further result of the negligence and carelessness of the Defendant(s), the plaintiff, **WILLIAM J. KNIGHT**, was compelled to expend and will be obliged in the future to continue to expend, large sums of money for medical treatment and other apparatus, all to his further loss and detriment.

17. As a further result of said accident, the plaintiff has suffered lost wages and may have an impairment of his earning capacity.

18. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, was employed by Costello Landscaping.

19. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, filed a workers' compensation claim based upon the facts alleged herein and said claim is currently pending.

20. At all times hereinafter mentioned and pursuant to said workers' compensation claim, the plaintiff, **WILLIAM J. KNIGHT**, has claimed and/or will claim any probable future payments which his employer has become, or will become, by award, obligated to pay on account of the injuries sustained by the plaintiff as a result of said accident.

21. Pursuant to Connecticut General Statutes §52-190a certificates of reasonable inquiry is attached hereto as Exhibit A and incorporated herein.

**COUNT TWO: AS AGAINST BLOOMFIELD URGENT CARE LLC**

1. The Plaintiff, **WILLIAM J. KNIGHT**, is an individual residing in the Town of Burlington, Connecticut.
2. On or about November 18, 2020, the Defendant, **BLOOMFIELD URGENT CARE LLC**, was a Connecticut limited liability company that provided medical services at a urgent care facility in Plainville, Connecticut located at 240 East Street, Plainville, Connecticut (hereinafter "**BLOOMFIELD URGENT**").
3. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was a duly licensed emergency medicine doctor engaged in the practice of medicine in the State of Connecticut.
4. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was an employee, agents, apparent agents, representatives, and/or servants of the co-defendants, **BLOOMFIELD**, and acting within the scope of his employment, agency, apparent agency, representation, authority, and/or apparent authority.
5. At all times mentioned herein, **MATHEW THOMAS, M.D.**, performed his responsibilities as an emergency care physician pursuant to the rules, regulations, practices, protocols and standard operating procedures promulgated by **BLOOMFIELD URGENT**.

6. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was acting in furtherance of the interests of **BLOOMFIELD URGENT**, and for the benefit of **BLOOMFIELD URGENT**.
7. 10. On or about November 18, 2020, Plaintiff presented to **BLOOMFIELD URGENT**, 240 East Street, Plainville, Connecticut, where he was evaluated for a finger injury sustained at work with complaints of right index finger swelling, bleeding and discharge following a high-pressure injection injury wherein hydraulic fluid punctured his skin.
8. At said date time and place, Defendant, **MATHEW THOMAS, M.D.**, failed to diagnosis the high-pressure injection injury and make an immediate referral to a hand surgeon for immediate treatment. Plaintiff was discharged from said visit with a differential diagnosis which included finger contusion sprain and instructed to follow up if needed, remain out of work until 11/23/20 and failed to mention the high pressure injection injury with hydraulic fluid.
9. On or about November 20, 2020, the Plaintiff returned to **BLOOMFIELD URGENT**, with complaints of significant finger pain, swelling, blisters and discoloration wherein a referral to a hand surgeon was made by defendant, **MATHEW THOMAS, M.D.**
10. On or about November 20, 2020, the Plaintiff sought treatment from an orthopedic surgeon, Christopher Judson M.D., who diagnosed plaintiff with a high-pressure

injection injury with compartment syndrome of the right index finger which called for emergent incision and drainage with compartment release and irrigation of the flexor tendon sheath.

11. On or about December 30, 2020, Plaintiff underwent amputation of his right index finger due to the negligence of the defendants, **MATHEW THOMAS, M.D.**, and **BLOOMFIELD URGENT**.
12. While under the care, treatment, monitoring, diagnosing and supervision of the defendants, **MATHEW THOMAS, M.D.**, and **BLOOMFIELD URGENT**. and/or their servants, agents, apparent agents and/or employees, the plaintiff, **WILLIAM J. KNIGHT**, suffered severe, serious, painful and permanent injuries as hereinafter set forth.
13. The said injuries suffered by the plaintiff, **WILLIAM J. KNIGHT**, were caused by the failure of defendants, **MATHEW THOMAS, M.D.**, and **BLOOMFIELD URGENT**. and/or their servants, agents, apparent agents and/or employees to exercise reasonable care under all of the facts and circumstances then and there present in that they:
  - a. failed to adequately and properly care for, treat, diagnose, and monitor plaintiff for a high-pressure injection finger injury
  - b. performed inappropriate care, and treatment of the plaintiff while at urgent care facility;
  - c. failed to recognize that the care, treatment and chosen approach of diagnosis of finger contusion/sprain was not the appropriate method



to treat a high-pressure injection injury;

- d. failed to recognize that the care, treatment and chosen approach placed plaintiff at an increased risk of an amputation;
- e. improperly put plaintiff at an increased risk of the need for amputation including, loss of the entire index finger of his right hand;
- f. failed to provide or refer the plaintiff immediately to physicians and surgeons who possess the requisite knowledge, skill and experience to adequately and properly care for, treat, diagnose, monitor and supervise patients such as plaintiff;
- g. failed to promulgate and/or enforce rules, regulations, standards and protocols for the care and treatment of patients such as plaintiff.

14. As a result of the carelessness and negligence of defendants, **MATHEW THOMAS, M.D.**, and **BLOOMFIELD URGENT** and/or their servants, agents, apparent agents and/or employees, **WILLIAM J. KNIGHT** suffered the following severe, serious, painful and permanent injuries:

- a. right hand/finger injury;
- b. compartment syndrome of the right index finger;
- c. right finger amputation;
- d. phantom finger syndrome;
- e. significant right index finger pain;
- f. loss of function and strength to right hand; and
- g. great pain and mental anguish.

15. As a result of the aforementioned injuries, **WILLIAM J. KNIGHT** has sustained

significant pain and suffering, great mental anguish and has been permanently deprived of his ability to carry on and enjoy life activities.

16. As a further result of the negligence and carelessness of the Defendant(s), the plaintiff, **WILLIAM J. KNIGHT**, was compelled to expend and will be obliged in the future to continue to expend, large sums of money for medical treatment and other apparatus, all to his further loss and detriment.
17. As a further result of said accident, the plaintiff has suffered lost wages and may have an impairment of his earning capacity.
18. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, was employed by Costello Landscaping.
19. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, filed a workers' compensation claim based upon the facts alleged herein and said claim is currently pending.
20. At all times hereinafter mentioned and pursuant to said workers' compensation claim, the plaintiff, **WILLIAM J. KNIGHT**, has claimed and/or will claim any probable future payments which his employer has become, or will become, by award, obligated to pay on account of the injuries sustained by the plaintiff as a result of said accident.
21. Pursuant to Connecticut General Statutes §52-190a certificates of reasonable inquiry is attached hereto as Exhibit A and incorporated herein.

**COUNT THREE: AS AGAINST GRANBY URGENT CARE LLC**

1. The Plaintiff, **WILLIAM J. KNIGHT**, is an individual residing in the Town of Burlington, Connecticut.
2. On or about November 18, 2020, the Defendant, **GRANBY URGENT CARE LLC**, was a Connecticut limited liability company that provided medical services at a urgent care facility in Plainville, Connecticut located at 240 East Street, Plainville, Connecticut (hereinafter "**GRANBY URGENT**").
3. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was a duly licensed emergency medicine doctor engaged in the practice of medicine in the State of Connecticut.
4. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was an employee, agents, apparent agents, representatives, and/or servants of the co-defendants, **GRANBY URGENT**, and acting within the scope of his employment, agency, apparent agency, representation, authority, and/or apparent authority.
5. At all times mentioned herein, **MATHEW THOMAS, M.D.**, performed his responsibilities as an emergency care physician pursuant to the rules, regulations, practices, protocols and standard operating procedures promulgated by **GRANBY URGENT**.

6. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was acting in furtherance of the interests of **GRANBY URGENT**, and for the benefit of **GRANBY URGENT**.
7. 10. On or about November 18, 2020, Plaintiff presented to **GRANBY URGENT**, 240 East Street, Plainville, Connecticut, where he was evaluated for a finger injury sustained at work with complaints of right index finger swelling, bleeding and discharge following a high-pressure injection injury wherein hydraulic fluid punctured his skin.
8. At said date time and place, Defendant, **MATHEW THOMAS, M.D.**, failed to diagnosis the high-pressure injection injury and make an immediate referral to a hand surgeon for immediate treatment. Plaintiff was discharged from said visit with a differential diagnosis which included finger contusion sprain and instructed to follow up if needed, remain out of work until 11/23/20 and failed to mention the high pressure injection injury with hydraulic fluid.
9. On or about November 20, 2020, the Plaintiff returned to **GRANBY**, with complaints of significant finger pain, swelling, blisters and discoloration wherein a referral to a hand surgeon was made by defendant, **MATHEW THOMAS, M.D.**
10. On or about November 20, 2020, the Plaintiff sought treatment from an orthopedic surgeon, Christopher Judson M.D., who diagnosed plaintiff with a high-pressure injection injury with compartment syndrome of the right index finger which called for

emergent incision and drainage with compartment release and irrigation of the flexor tendon sheath.

11. On or about December 30, 2020, Plaintiff underwent amputation of his right index finger due to the negligence of the defendants, **MATHEW THOMAS, M.D.**, and **GRANBY URGENT**.
12. While under the care, treatment, monitoring, diagnosing and supervision of the defendants, **MATHEW THOMAS, M.D.**, and **GRANBY URGENT**. and/or their servants, agents, apparent agents and/or employees, the plaintiff, **WILLIAM J. KNIGHT**, suffered severe, serious, painful and permanent injuries as hereinafter set forth.
13. The said injuries suffered by the plaintiff, **WILLIAM J. KNIGHT**, were caused by the failure of defendants, **MATHEW THOMAS, M.D.**, and **GRANBY URGENT**, and/or their servants, agents, apparent agents and/or employees to exercise reasonable care under all of the facts and circumstances then and there present in that they:
  - a. failed to adequately and properly care for, treat, diagnose, and monitor plaintiff for a high-pressure injection finger injury
  - b. performed inappropriate care, and treatment of the plaintiff while at urgent care facility;
  - c. failed to recognize that the care, treatment and chosen approach of diagnosis of finger contusion/sprain was not the appropriate method to treat a high-pressure injection injury;
  - d. failed to recognize that the care, treatment and chosen approach placed plaintiff at an increased risk of an amputation;

- e. improperly put plaintiff at an increased risk of the need for amputation including, loss of the entire index finger of his right hand;
  - f. failed to provide or refer the plaintiff immediately to physicians and surgeons who possess the requisite knowledge, skill and experience to adequately and properly care for, treat, diagnose, monitor and supervise patients such as plaintiff;
  - g. failed to promulgate and/or enforce rules, regulations, standards and protocols for the care and treatment of patients such as plaintiff.
14. As a result of the carelessness and negligence of defendants, **MATHEW THOMAS, M.D.**, and **GRANBY URGENT** and/or their servants, agents, apparent agents and/or employees, **WILLIAM J. KNIGHT** suffered the following severe, serious, painful and permanent injuries:
- a. right hand/finger injury;
  - b. compartment syndrome of the right index finger;
  - c. right finger amputation;
  - d. phantom finger syndrome;
  - e. significant right index finger pain;
  - f. loss of function and strength to right hand; and
  - g. great pain and mental anguish.
15. As a result of the aforementioned injuries, **WILLIAM J. KNIGHT** has sustained significant pain and suffering, great mental anguish and has been permanently deprived of his ability to carry on and enjoy life activities.

16. As a further result of the negligence and carelessness of the Defendant(s), the plaintiff, **WILLIAM J. KNIGHT**, was compelled to expend and will be obliged in the future to continue to expend, large sums of money for medical treatment and other apparatus, all to his further loss and detriment.
17. As a further result of said accident, the plaintiff has suffered lost wages and may have an impairment of his earning capacity.
18. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, was employed by Costello Landscaping.
19. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, filed a workers' compensation claim based upon the facts alleged herein and said claim is currently pending.
20. At all times hereinafter mentioned and pursuant to said workers' compensation claim, the plaintiff, **WILLIAM J. KNIGHT**, has claimed and/or will claim any probable future payments which his employer has become, or will become, by award, obligated to pay on account of the injuries sustained by the plaintiff as a result of said accident.
21. Pursuant to Connecticut General Statutes §52-190a certificates of reasonable inquiry is attached hereto as Exhibit A and incorporated herein.

**COUNT FOUR: AS AGAINST STEPHEN A KEI, MD d/b/a THE DOCTORS  
TREATMENT CENTER PLAINVILLE**

1. The Plaintiff, **WILLIAM J. KNIGHT**, is an individual residing in the Town of Burlington, Connecticut.
2. On or about November 18, 2020, the Defendant, **STEPHEN A KEI, MD d/b/a THE DOCTORS TREATMENT CENTER PLAINVILLE (hereinafter “DR. KEI”)**, was an individual with a residence located at 15 Gale Road, Bloomfield, Connecticut 06002, that provided medical services at a urgent care facility in Plainville, Connecticut located at 240 East Street, Plainville, Connecticut.
3. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was a duly licensed emergency medicine doctor engaged in the practice of medicine in the State of Connecticut.
4. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was an employee, agent, apparent agent, representative, and/or servant of the co-defendants, **DR. KEI**, and acting within the scope of his employment, agency, apparent agency, representation, authority, and/or apparent authority.
5. At all times mentioned herein, **MATHEW THOMAS, M.D.**, performed his responsibilities as an emergency care physician pursuant to the rules, regulations, practices, protocols and standard operating procedures promulgated by **DR. KEI**.
6. At all times mentioned herein, **MATHEW THOMAS, M.D.**, was acting in furtherance of the interests of **DR. KEI**, and for the benefit of **DR. KEI**.



7. 10. On or about November 18, 2020, Plaintiff presented to **DR. KEI**, 240 East Street, Plainville, Connecticut, where he was evaluated for a finger injury sustained at work with complaints of right index finger swelling, bleeding and discharge following a high-pressure injection injury wherein hydraulic fluid punctured his skin.
8. At said date time and place, Defendant, **MATHEW THOMAS, M.D.**, failed to diagnosis the high-pressure injection injury and make an immediate referral to a hand surgeon for immediate treatment. Plaintiff was discharged from said visit with a differential diagnosis which included finger contusion sprain and instructed to follow up if needed, remain out of work until 11/23/20 and failed to mention the high pressure injection injury with hydraulic fluid.
9. On or about November 20, 2020, the Plaintiff returned to **DR. KEI**, with complaints of significant finger pain, swelling, blisters and discoloration wherein a referral to a hand surgeon was made by defendant, **MATHEW THOMAS, M.D.**
10. On or about November 20, 2020, the Plaintiff sought treatment from an orthopedic surgeon, Christopher Judson M.D., who diagnosed plaintiff with a high-pressure injection injury with compartment syndrome of the right index finger which called for emergent incision and drainage with compartment release and irrigation of the flexor tendon sheath.

11. On or about December 30, 2020, Plaintiff underwent amputation of his right index finger due to the negligence of the defendants, **MATHEW THOMAS, M.D.**, and **DR. KEI**.
12. While under the care, treatment, monitoring, diagnosing and supervision of the defendants, **MATHEW THOMAS, M.D.**, and **DR. KEI**, and/or their servants, agents, apparent agents and/or employees, the plaintiff, **WILLIAM J. KNIGHT**, suffered severe, serious, painful and permanent injuries as hereinafter set forth.
13. The said injuries suffered by the plaintiff, **WILLIAM J. KNIGHT**, were caused by the failure of defendants, **MATHEW THOMAS, M.D.**, and **DR. KEI**, and/or his servants, agents, apparent agents and/or employees to exercise reasonable care under all of the facts and circumstances then and there present in that they:
  - a. failed to adequately and properly care for, treat, diagnose, and monitor plaintiff for a high-pressure injection finger injury
  - b. performed inappropriate care, and treatment of the plaintiff while at urgent care facility;
  - c. failed to recognize that the care, treatment and chosen approach of diagnosis of finger contusion/sprain was not the appropriate method to treat a high-pressure injection injury;
  - d. failed to recognize that the care, treatment and chosen approach placed plaintiff at an increased risk of an amputation;
  - e. improperly put plaintiff at an increased risk of the need for amputation including, loss of the entire index finger of his right hand;
  - f. failed to provide or refer the plaintiff immediately to physicians and surgeons who possess the requisite knowledge, skill and experience

to adequately and properly care for, treat, diagnose, monitor and supervise patients such as plaintiff;

- g. failed to promulgate and/or enforce rules, regulations, standards and protocols for the care and treatment of patients such as plaintiff.

14. As a result of the carelessness and negligence of defendant, **DR. KEI**, and/or his servants, agents, apparent agents and/or employees, **WILLIAM J. KNIGHT** suffered the following severe, serious, painful and permanent injuries:

- a. right hand/finger injury;
- b. compartment syndrome of the right index finger;
- c. right finger amputation;
- d. phantom finger syndrome;
- e. significant right index finger pain;
- f. loss of function and strength to right hand; and
- g. great pain and mental anguish.

15. As a result of the aforementioned injuries, **WILLIAM J. KNIGHT** has sustained significant pain and suffering, great mental anguish and has been permanently deprived of his ability to carry on and enjoy life activities.

16. As a further result of the negligence and carelessness of the Defendant(s), the plaintiff, **WILLIAM J. KNIGHT**, was compelled to expend and will be obliged in the future to continue to expend, large sums of money for medical treatment and other apparatus, all to his further loss and detriment.

17. As a further result of said accident, the plaintiff has suffered lost wages and may have an impairment of his earning capacity.
18. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, was employed by Costello Landscaping.
19. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, filed a workers' compensation claim based upon the facts alleged herein and said claim is currently pending.
20. At all times hereinafter mentioned and pursuant to said workers' compensation claim, the plaintiff, **WILLIAM J. KNIGHT**, has claimed and/or will claim any probable future payments which his employer has become, or will become, by award, obligated to pay on account of the injuries sustained by the plaintiff as a result of said accident.
21. Pursuant to Connecticut General Statutes §52-190a certificates of reasonable inquiry is attached hereto as Exhibit A and incorporated herein.

**COUNT FIVE: v. MATHEW THOMAS, M.D.**

1. The Plaintiff, **WILLIAM J. KNIGHT**, is an individual residing in the Town of Burlington, Connecticut.
2. On or about November 18, 2020, Defendant, **MATHEW THOMAS, M.D.**, was a duly licensed emergency medicine doctor engaged in the practice of medicine in the State of Connecticut.

3. At all times mentioned herein, **MATHEW THOMAS, M.D.**, an individual with a residence located 450 Wedgewood Road, Southington Connecticut, 06489 performed his responsibilities as an emergency care physician pursuant to the rules, regulations, practices, protocols, and standard operating procedures promulgated by the facility in which he practiced emergency medicine located at 240 East Street, Plainville, Connecticut which conducted business as “The Doctors Treatment Center.”
4. On or about November 18, 2020, Plaintiff presented to **MATHEW THOMAS, M.D.**, 240 East Street, Plainville, Connecticut, where he was evaluated for a finger injury sustained at work with complaints of right index finger swelling, bleeding and discharge following a high-pressure injection injury wherein hydraulic fluid punctured his skin.
5. At said date time and place, Defendant, **MATHEW THOMAS, M.D.**, failed to diagnosis the high-pressure injection injury and make an immediate referral to a hand surgeon for immediate treatment. Plaintiff was discharged from said visit with a differential diagnosis which included finger contusion sprain and instructed to follow up if needed, remain out of work until 11/23/20 and failed to mention the high-pressure injection injury with hydraulic fluid.
6. On or about November 20, 2020, the Plaintiff returned to **MATHEW THOMAS, M.D.**, with complaints of significant finger pain, swelling, blisters and discoloration

wherein a referral to a hand surgeon was made by defendant, **MATHEW THOMAS, M.D.**

7. On or about November 20, 2020, the Plaintiff sought treatment from an orthopedic surgeon, Christopher Judson M.D., who diagnosed plaintiff with a high-pressure injection injury with compartment syndrome of the right index finger which called for emergent incision and drainage with compartment release and irrigation of the flexor tendon sheath.
8. On or about December 30, 2020, Plaintiff underwent amputation of his right index finger due to the negligence of the defendants, **MATHEW THOMAS, M.D.**
9. While under the care, treatment, monitoring, diagnosing and supervision of the defendants, **MATHEW THOMAS, M.D.**, the plaintiff, **WILLIAM J. KNIGHT**, suffered severe, serious, painful, and permanent injuries as hereinafter set forth.
10. The said injuries suffered by the plaintiff, **WILLIAM J. KNIGHT**, were caused by the failure of defendant, **MATHEW THOMAS, M.D** to exercise reasonable care under all of the facts and circumstances then and there present in that they:
  - a. failed to adequately and properly care for, treat, diagnose, and monitor plaintiff for a high-pressure injection finger injury
  - b. performed inappropriate care, and treatment of the plaintiff while at urgent care facility;
  - c. failed to recognize that the care, treatment and chosen approach of diagnosis of finger contusion/sprain was not the appropriate method to treat a high-pressure injection injury;

- d. failed to recognize that the care, treatment and chosen approach placed plaintiff at an increased risk of an amputation;
  - e. improperly put plaintiff at an increased risk of the need for amputation including, loss of the entire index finger of his right hand;
  - f. failed to provide or refer the plaintiff immediately to physicians and surgeons who possess the requisite knowledge, skill and experience to adequately and properly care for, treat, diagnose, monitor and supervise patients such as plaintiff;
  - g. failed to promulgate and/or enforce rules, regulations, standards and protocols for the care and treatment of patients such as plaintiff.
11. As a result of the carelessness and negligence of defendants, **MATHEW THOMAS, M.D., WILLIAM J. KNIGHT** suffered the following severe, serious, painful and permanent injuries:
- a. right hand/finger injury;
  - b. compartment syndrome of the right index finger;
  - c. right finger amputation;
  - d. phantom finger syndrome;
  - e. significant right index finger pain;
  - f. loss of function and strength to right hand; and
  - g. great pain and mental anguish.
12. As a result of the aforementioned injuries, **WILLIAM J. KNIGHT** has sustained significant pain and suffering, great mental anguish and has been permanently deprived of his ability to carry on and enjoy life activities.

13. As a further result of the negligence and carelessness of the Defendant(s), the plaintiff, **WILLIAM J. KNIGHT**, was compelled to expend and will be obliged in the future to continue to expend, large sums of money for medical treatment and other apparatus, all to his further loss and detriment.
14. As a further result of said accident, the plaintiff has suffered lost wages and may have an impairment of his earning capacity.
15. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, was employed by Costello Landscaping.
16. At all times hereinafter mentioned, the plaintiff, **WILLIAM J. KNIGHT**, filed a workers' compensation claim based upon the facts alleged herein and said claim is currently pending.
17. At all times hereinafter mentioned and pursuant to said workers' compensation claim, the plaintiff, **WILLIAM J. KNIGHT**, has claimed and/or will claim any probable future payments which his employer has become, or will become, by award, obligated to pay on account of the injuries sustained by the plaintiff as a result of said accident.
18. Pursuant to Connecticut General Statutes §52-190a certificates of reasonable inquiry is attached hereto as Exhibit A and incorporated herein.

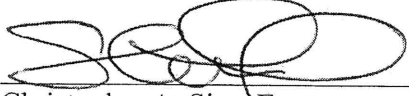


**WHEREFORE**, the plaintiff claims the following:

1. Monetary damages;
2. Costs of this action;
3. Any other relief, legal or equitable as the Court may deem appropriate.

PLAINTIFF,  
**WILLIAM J. KNIGHT**

By: \_\_\_\_\_

  
Christopher A. Sica, Esq.  
Steven L. Katz, Esq.  
ROME CLIFFORD KATZ & KOERNER, LLP  
214 Main Street  
Hartford, CT 06106  
Juris No. 304302  
Telephone: (860) 527-7044  
Facsimile: (860) 920-0000

  
**A TRUE COPY ATTEST**

**KEITH D. NIZIANKIEWICZ  
CONNECTICUT STATE MARSHAL  
INDIFFERENT PERSON**

RETURN DATE: MARCH 14, 2023 : SUPERIOR COURT  
WILLIAM J. KNIGHT : J.D. OF NEW BRITAIN  
VS. : AT NEW BRITAIN

MATHEW THOMAS, M.D.,  
OCCUPATIONAL MEDICINE OF THE  
NORTHEAST, LLC, BLOOMFIELD  
URGENT CARE LLC, GRANBY URGENT  
CARE LLC, STEPHEN A. KEI, M.D. d/b/a  
THE DOCTORS TREATMENT CENTER  
PLAINVILLE

: FEBRUARY 16, 2023

**STATEMENT IN AMOUNT OF DEMAND**

The plaintiff in the above-entitled matter seeks monetary damages in excess of \$15,000.00, exclusive of legal interest and costs. Additionally, should he prevail, the plaintiff seeks that all costs recovered be included in his "amount recovered."

PLAINTIFF,  
WILLIAM J. KNIGHT

By:



Christopher A. Sica, Esq.  
Steven L. Katz, Esq.  
ROME CLIFFORD KATZ & KOERNER, LLP  
214 Main Street  
Hartford, CT 06106  
Juris No. 304302  
Telephone: (860) 527-7044  
Facsimile: (860) 920-0000

**A TRUE COPY ATTEST**  
  
KEITH D. NIZANKIEWICZ  
CONNECTICUT STATE MARSHAL  
INDIFFERENT PERSON

# EXHIBIT A

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Attention: Christopher Sica, Esq.  
214 Main Street  
Hartford, CT 06106

January 16th 2023

Dear Mr. Sica,

I had the opportunity to review the medical records you sent me regarding Mr. William Knight's (DOB: 4/26/75) visits to the Doctor's Treatment Center in Plainville, CT on 11/18/20 and 11/20/20 by Dr. Matthew Thomas and follow up care by subsequent medical professionals.

It is my firm opinion that standard of care was violated when viewing this case prospectively. That is, the majority of similarly trained physicians, in the same work environment and with the same training as Dr. Thomas, would have treated Mr. Knight differently and likely saved him from an unnecessary amputated finger, pain and suffering.

I graduated from Tulane Medical School in 2003, and while I have never faced a malpractice case personally, I have sat on a multi-specialty Peer Review Committee in a large University health care system and have a fine-tuned understanding of prospective standard of care, especially in the Urgent Care, Emergency Department and Hospital settings since my career has allowed me to practice in all of these areas.

The initial care rendered to Mr. Knight was problematic on several fronts. This patient reported his injury as involving caustic chemicals, and a high-pressure injury. This history alone mandates referral to an orthopedic surgeon for emergency surgical exploration, washout and debridement. It is a true limb-threatening medical emergency that we face not only in real life experience, but also on board certification tests, residency training and through CME. It cannot be missed.

Mr. Knight presented on November 18th with cardinal (and obvious) signs and symptoms associated with these types of injuries:

- A small laceration or puncture, frequently/classically at the tip of a finger
- The small laceration at the tip of the finger is inconsistent with a blunt-force sprain type trauma, but more consistent with high-pressure injection injury
- Pain out of proportion to the exam (patient reported pain of 7/10, seldom seen without fracture and not consistent with a simple finger sprain diagnosis)
- A history of high-pressure injury and report of caustic materials involved on the medical records intake form
- A swollen finger with decreased range of motion

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In summary, I will testify that it is my strong and supported medical opinion that prospective standard of care was breached in this matter. I have been practicing medicine for 17 years post residency, have been evaluating standard of care vis a vis prospective analysis for the last 6 years, and have rendered numerous unbiased opinions for both Plaintiff and Defense, often that I cannot support their position. Furthermore, I have seen this type of case many times in my career. It is one of those can't-miss cases that we are expected to get right and must get right.

The professional negligence in this matter by Dr. Thomas cost Mr. Knight his finger—and more—as there are numerous psychological sequelae to losing a part of your body (especially one that was needlessly lost and so important for the activities of daily life\_.

Generally, I state a reasonable degree of medical certainty about an opinion. In this matter, I have a high degree of medical certainty that had Dr. Thomas arrived at the obvious and critical correct diagnosis on November 18th 2020, Mr. Knight would still most likely have normal use of his hand today.

I will testify to these above opinions, typical physician training about high-pressure caustic injection injuries, standard of care in this matter and other nuances of the medical care delivered to Mr. Knight during this missed diagnosis.

Please feel free to reach out by email or telephonically to discuss the matter further.

Sincerely,

Alan Rome  
Rome Clifford Katz & Koerner, LLP  
214 Main St.  
Hartford, CT 06106

Re:

Dear Mr. Rome:

This is in response to your letter requesting a review of medical records on the aforementioned patient.

I have reviewed the medical records supplied from the doctors treatment center as well as those of Dr. Judson including his operative note.

Based on my expertise as a board-certified orthopedic surgeon with a certificate for added qualification for surgery of the hand and upper extremity I would opine the following. Mr. Knight had a documented high-pressure injection injury to his finger and presented to the Doctor's Treatment Center on November 18, 2020. The examination that time revealed findings termed Kanavel's signs which are signs of an infected flexor tenosynovitis. The patient also had a documented high-pressure injection injury with a solvent.

The patient was discharged and returned with signs of a more aggressive flexor tenosynovitis and the sequelae of a high-pressure injection injury. Dr. Judson brought the patient to the operating room on November 20 and found nonviable tissue.

High-pressure injection injuries are considered a emergent injury to the digit and requires emergent debridement in an operating room setting. It appears from the medical records that initial diagnosis was that of a sprain and contusion in the extent and the nature of the injury was not medically appreciated. This clearly falls outside the standards of care, with signs of negligence that has caused permanent irreparable harm to the patient. Within reasonable medical probability, prompt, appropriate attention to this injury could have allow the patient to save his digit.

All findings are made within reasonable medical probability in good faith

Very truly yours,

DOCKET NO:

SUPERIOR COURT

WILLIAM KNIGHT

J.D. of NEW BRITAIN

V.

AT NEW BRITAIN

THE DOCTOR'S TREATMENT CENTER  
DR. MATHEW THOMAS  
DR. STEPHEN KEI  
DR. KATHRYN M. PAPADAKIS  
DR. EMILY Y. RHEUME

NOVEMBER 17, 2022

**PETITION FOR EXTENSION OF TIME OF THE STATUTE OF LIMITATIONS.**

Pursuant to Section 52-19a(b) of the Connecticut General Statutes, the Petitioner, William Knight, respectfully petitions the Clerk of this Court for a ninety (90) day extension of the Statute of Limitations. This extension is necessary in order to make reasonable inquiries to determine whether the treatment rendered to William Knight by The Doctor's Treatment Center, Dr. Mathew Thomas, Dr. Stephen Kei, Dr. Kathryn Papadakis, Dr. Emily Rheume and other physicians not readily identifiable was negligent, and to comply with the Certificate of Good Faith required in Section 52-190a of the Connecticut General Statutes. This matter concerns the medical care and treatment rendered to William Knight and has its earliest possible actionable date of November 18, 2022.

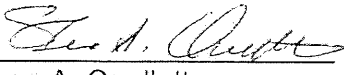
The Petitioner submits this Petition to extend the Statute of Limitations in this case until ninety (90) days from November 18, 2022. The Statute of Limitations has not expired as of the date of this filing.

NOV 17 2022  
11:23 AM  
CLERK OF COURT

Granted, 11/17/2022

*Kalbaugh*  
KATHERINE ALBAUGH  
ASSISTANT CLERK

THE PETITIONER  
WILLIAM KNIGHT

By   
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